

Case Name: GEICO, et al. v. Chumaceiro, et al. Case Number 1:20-cv-02220 (EK)(PK)

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER			
	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held			7/27/20
2. Rule 26(a)(1) disclosures exchanged			8/18/20
3. Requests made:			
a. Medical records authorization		X	
b. Section 160.50 release for arrest records		X	
c. Identification of John Doe/Jane Doe Defendants			3/15/21
d. Proposed Stipulation of Confidentiality			9/1/20
4. Procedures for producing Electronically Stored Information (ESI) discussed			7/27/20
B. SETTLEMENT			
1. Plaintiff to make settlement demand			1/15/21
2. Defendant to make settlement offer			1/22/21
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)			
4. Settlement Conference (proposed date)			1/25/21
C. PROPOSED DEADLINES <i>**Ex parte settlement statements due January 15, 2021</i>			
1. Motion to join new parties or amend pleadings			3/15/21
2. Initial document requests and interrogatories			10/23/20
3. All fact discovery to be completed (including disclosure of medical records)			4/16/21
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			4/23/21
5. Expert discovery (only if needed)	<i>Check here if not applicable</i> <input type="checkbox"/>		

Plaintiff expert proposed field of expertise	(i) Healthcare; (ii) financial/accounting		
Defendant expert proposed field of expertise	(i) Healthcare; (ii) financial/accounting		
	DONE	Not Applicable	DATE
a. Case-In-chief expert report due			5/20/21
b. Rebuttal expert report due			6/20/21
c. Depositions of experts to be completed			7/20/21
6. Completion of ALL DISCOVERY			7/20/21
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			7/21/21
8. If District Judge requires Pre-Motion Conference, date to make request			7/28/21
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule		X	
10. Joint Pre-Trial Order due (if no dispositive motion filed)			8/29/21
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?		<input type="checkbox"/> YES X NO	
2. All parties consent to Magistrate Judge jurisdiction for trial?		<input type="checkbox"/> YES X NO	
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			
a. Response due			
b. Reply due			

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo

PEGGY KUO
United States Magistrate Judge

August 18, 2020

Date

** A joint status report is due October 7, 2020 addressing the progress of discovery